

REMARKS

Claims 1-20 remain for consideration. The rejections of the claims are traversed in the arguments below.

Claims 1, 5, 13, 18, 19, and 20 are amended to further clarify the invention.

New claims 21-24 are added to claim the invention in alternative language. These new claims are supported by the specification, and no new matter has been added.

The Office Action does not establish that claims 1-3, and 5-20 are unpatentable under 35 USC §103(a) over US Patent 6,292,801 to Campbell et al. (“Campbell”) in view of US Patent 6,377,955 to Hartmann et al. (“Hartmann”). The rejection is respectfully traversed because the Office Action fails to show that all the limitations are suggested by the references, fails to provide a proper motivation for modifying the teachings of Campbell with teachings of Hartmann, and fails to show that the combination could be made with a reasonable likelihood of success.

The Office Action does not show that the Campbell-Hartmann combination shows or suggests all the limitations of the invention. The present invention, for example, in claim 1, provides a method for report selection in which report requirements are used in combination with database content to determine for each report identifier whether the data types of the data elements present in the database satisfy the associated set of requirements, and output a report identifier for each report for which the requirements are satisfied by the database content. The determining of reports compatible with the database and outputting of corresponding report identifiers aids a user in an environment in which there are a very large number of data types that may be present in a database and a large number of reports, the usefulness of which depends on the content of the database. The different sections of Campbell and Hartmann cited in the Office Action neither show nor suggest these limitations.

Campbell’s is a system that tracks ownership data for data resources coupled on a network (Abstract). The cited sections of Campbell appear to teach selecting data for a report (col. 13, ll. 52-60) and sending the report to multiple destinations (col. 14, ll. 5-46). Campbell’s FIG. 10 shows a list of report names. Campbell’s listing of report names, even if construed as

report identifiers, does not show or suggest that these reports have associated requirements that are satisfied by data types of elements in the database.

Hartmann's system generates a report that summarizes performance of a network (Abstract). Configuration information that defines the report and includes a report type identifier is stored (col. 3, ll. 17-20). Hartmann's report generator is table driven, which allows a user to configure reports (col. 7, ll. 1-5). Neither of Campbell nor Hartmann shows or suggests determining for which reports a database satisfies the report requirements. For both Campbell and Hartmann, there is no apparent deviation between report requirements and database content. Therefore, the Office Action does not show that the Campbell-Hartmann combination shows or suggests all the limitations of the claims.

The Office Action does not provide a proper motivation to support combining the teachings of Campbell and Hartmann. The alleged motivation states that it would have been obvious to combine the teachings "so as to have a set of report requirements in order to generate a user desired a report such as a performance characteristics of a computer network, from the reporting interface as teaching of Campbell in fig. 10 ... the motivation being to generate and to control the reporting tools and to send a report generated by a report object to multiple destinations with GUI of reporting interface."

The alleged motivation is improper because it is apparently based on the idea of using report requirements to select data from a database. Even though report requirements would be used to select data from a database, this reason alone would not motivate one to combine the teachings of Campbell and Hartmann. Campbell's system appears to be suitable for its stated purpose of tracking ownership data for resources coupled to a network, and the Office Action has not identified any particular deficiency of Campbell that would be improved by Hartmann's generating reports on network performance based on data formatted in the RADIUS protocol.

The alleged motivation is merely a broad conclusory statement of Campbell's and Hartmann's functions, and no evidence has been provided that suggests the combination. Therefore, the alleged motivation is insufficient to support *prima facie* obviousness. The rejection of claims 1-3 and 5-20 over the Campbell-Hartmann combination should be withdrawn because the Office Action fails to show all the limitations are suggested by the combination, fails

to provide a proper motivation for combining the references, and fails to show that the combination could be made with a reasonable likelihood of success.

Claims 2 and 3 depend from claim 1, and the Office Action does not establish a *prima facie* case of obviousness for at least the reasons set forth above for claim 1.

Claim 5 includes limitations similar to the limitations of claim 1, and the Office Action does not establish a *prima facie* case of obviousness for at least the reasons set forth above for claim 1.

In regards to claims 6-8, the further limitations include for different log record types storing the log data in respective log data tables. It is respectfully submitted that none of the cited teachings of Campbell suggest respective log data tables for different log record types. The cited teachings appear to suggest different sources of log data, but not how the data from the different sources is stored in the database. Therefore, along with the reasons set forth above for claim 5, the Office Action does not establish *prima facie* obviousness for claims 6-8.

Claims 9-12 depend directly and indirectly from claim 5, and the Office Action does not establish a *prima facie* case of obviousness for at least the reasons set forth above for claim 5.

Claims 13-17 includes the limitations of claim 5, along with additional limitations, and the Office Action does not establish a *prima facie* case of obviousness for at least the reasons set forth above for claim 5.

Claims 18 and 19 are apparatus claims that include limitations similar to those described above for claims 1 and 5. Therefore, for at least the reasons set forth above, the Office Action does not establish a *prima facie* case of obviousness for at least the reasons set forth above.

The Office Action does not establish that claim 4 is unpatentable under 35 USC §103(a) over Campbell in view of Hartmann and further in view of US Patent 6,643,635 to Nwabueze. The rejection is respectfully traversed because the Office Action fails to show that all the limitations are suggested by the references, fails to provide a proper motivation for modifying the teachings of Campbell with teachings of Hartmann, and fails to show that the combination could be made with a reasonable likelihood of success.

The Office Action does not establish that the combination shows all the limitations of claim 4, which depends from claim 1, for at least the reasons set forth above for claim 1.

Furthermore, the alleged motivation simply restates the limitations of claim 4 along with the same alleged motivation for combining the teachings of Campbell with Hartmann. In other words, the alleged motivation does not provide any further evidence to motivate one to further combine the teachings of Nwabueze with those of the Campbell-Hartmann combination. The alleged motivation fails to provide sufficient evidence that would motivate combining the teachings of Nwabueze, Campbell, and Hartmann, and is therefore, improper. The rejection of claim 4 over the Campbell-Hartmann-Nwabueze combination should be withdrawn because the Office Action fails to show all the limitations are suggested by the combination, fails to provide a proper motivation for combining the references, and fails to show that the combination could be made with a reasonable likelihood of success.

Withdrawal of the rejection and reconsideration of the claims are respectfully requested. If the examiner has any questions or concerns, a telephone call to the undersigned is welcome.

No extension of time is believed to be necessary for consideration of this response. However, if an extension of time is required, please consider this a petition for a sufficient number of months for consideration of this response. If there are any additional fees in connection with this response, please charge Deposit Account No. 50-0996 (USYS.032PA).

Respectfully submitted,

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